

## **REMARKS**

### **Election of Invention**

The examiner restricted the prosecution of this application to one of two groups of claims: Group I (claims 1-5) and Group II (claims 6-14). Applicants provisionally elected Group I with traverse. Applicants hereby affirm the election and consequently cancel claims 6-14 without prejudice.

### **Description of Amendments**

Without prejudice, new claims 15-17 have been added. New claims 15-17 add product-by-process limitations to the claimed invention. Support for these claims can be found in original claims 6-9. No new matter has been added.

### **Objections to Specification**

The examiner objected to specification because on page 6, line 1, "circuit board 12" should read "circuit board 14." In response, applicants have amended the specification as suggested by the examiner.

### **Request for Reconsideration**

The examiner rejected claims 1-5 under 35 U.S.C. §103(a) as being unpatentable over Laity (US Patent No.5,984,731) in view of Fun et al. (US Patent No. 6,166,913). In particular, the examiner stated that Laity disclosed a card in which the "plastic of said plastic panel at least partially engulfs said tabs to prevent withdrawal of said tabs from said one or more cavities and thereby interconnect said plastic and metal panels (column 5, lines 32-41)." Although the examiner admitted that Laity does not disclose a metal panel comprising a plurality of tabs with barbs, he added that "Fun shows a card 1 having a metal panel 20 including a plurality of tabs 26 with barbs 261 . . . ." The examiner concluded that "it would have been obvious . . . to modify the card of Laity and provide the tabs with barbs as taught by Fun in order to provide an interlocking frame . . . ."

In response, applicants submit that (a) the examiner has mis-characterized Laity, and that (b) there is no motivation to modify the card of Laity such that plastic of one half envelops a metal barb of the other half.

The examiner stated that Laity discloses a card in which "the "plastic of said plastic panel at least partially engulfs said tabs to prevent withdrawal of said tabs from said one or more cavities and thereby interconnect said plastic and metal panels." This characterization, however, is not accurate. Referring to Fig. 8 of Laity, even if we assume that the sides 66, 68 are tabs (which applicants do not necessarily concede to be the case), there is no suggestion that the sides 66, 68 of the metal half 60 are enveloped by the plastic of the other half 70 such that the sides cannot be pulled apart from the plastic. Although Laity does not elaborate on how the sides 66, 68 of the metal half 60 are secured to the plastic half 70, it is self evident that the plastic half 70 is not enveloping the sides to interlock the halves. Rather, the sides appear to be adhered to the plastic half. Indeed, the configuration of the card of Laity is exemplary of the problem in the prior art that the claimed invention is intended to overcome. "Specifically, plastic panels tend to be difficult to join to complementing metal panels using traditional techniques such as adhesion." Spec. p. 2, ll. 24-26. Therefore, applicants respectfully submit that Laity does not disclose interlocking plastic and metal halves as set forth in the claimed invention, but rather simply supports applicants' assessment of the prior art and the problems therewith.

In addition to the fact that Laity does not disclose enveloping the tabs of the metal half with the plastic of the other half, there is no motivation to combine Laity with Fun in modifying the card of Laity to have tabs with barbs. The examiner stated that the "it would have been obvious . . . to modify the card of Laity and provide the tabs with barbs as taught by Fun in order to provide an interlocking frame . . . ." Applicants submit, however, that the combination is the result of hindsight rather than motivation within Laity. Specifically, there is no suggestion in Laity of the *need* to provide interlocking halves. Indeed, there is no mention in Laity of even the shortcomings of adhering plastic to metal. Since Laity fails to suggest the problem of attaching metal and plastic halves together, much less recommending

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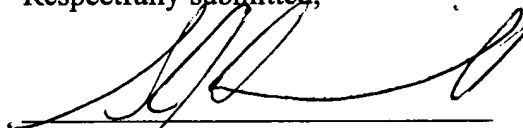
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solutions therefor, applicants submit that the examiner has impermissibly contrived a reason for combining these references rather than relying on the intrinsic teachings of the references themselves.

Accordingly, since the cited references alone or in combination fail to teach or suggest interlocking a metal half with a plastic half of a PCMCIA card by enveloping the barbs of the metal half with the plastic of the other half, the rejection should be withdrawn and the claims allowed. Thank you.

Respectfully submitted,



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## APPENDIX A

### Marked-up Version of Specification Showing Changes Made

Page 5, line 18:

Referring first to Figures 1 & 2, there is shown an exploded view of a generally rectangular Ethernet LAN communications card 10 incorporating the present invention. The card 10 conforms to the PCMCIA Type III and 16-bit interface standards. The card 10 comprises the following basic components: (a) a circuit board 14 having a connector 15 connected along a front edge 20 thereof and adapted for electrical connection to a host computer (not shown); (b) a housing for containing the circuit board [12]14 comprising a plastic top panel 11 with an opening 21 around the connector 15 and a conductive bottom panel 19 interconnected with the top panel 11; and (c) a conductive grounding shield 12 overlying a substantial portion of the circuit board 14 and at least a portion of the connector 15, and being electrically connected to the bottom panel 19. It should be noted that terms such as "top," "bottom," "upper," "lower," "vertical," and the like, are used herein only to facilitate the description of the structure of the card illustrated and should not be used to limit the scope of the invention. Furthermore, it should be evident that the card may be used in any orientation.